Pechiney – Draft Soil Management Plan – Revised September 18, 2015
Response to Comments
November 5, 2015

Comments received from DTSC by email (10-8-15)

Comment 1 - Section 1, second para "as described in the Land Use Covenant and Agreement for Environmental Restrictions (reference pending)". Please remove this sentence because we are approving SMP before LUC.

Response – Text has been deleted as suggested.

Comment 2 - Section 2, third para, provide remedial depths for each Phase.

Response – For clarity rather than depth, the text has been revised to include the range in vertical elevations for the soil removals in each phase.

Comment 3 - Section 2, last para, correct typo. "The Completion Reports (AMEC, 2014a, b, c, and d), also provided documentation of the below demolition **wok** conducted at the site."

Response – The typo has been corrected.

Comment 4 - Please add control measures if any VOC's vapors get encountered.

Response – Mitigation/control measures have been added to Section 5.2.1.

Comment 5 - Provide depths on the map for each area also (Fig 4).

Response – the vertical surface elevations for the below grade structures and underground warning barriers have been added to Figure 4.

Comment 6 - Notify DTSC in any case if impacted soil is encountered.

Response – Notification requirements have been added as a new Section 5.7 (Agency Notifications), and will be triggered in the event that impacted soil is encountered in areas beyond what is identified on Figure 7 during site grading or construction activities. This section also includes an EPA notification in the event that soil containing PCBs greater than 50 mg/kg are found. Notification shall be provided by phone call followed by electronic mail describing the area and impacted soil encountered.

Comments received from DTSC HERO by email (10-14-15)

Per your October 13, 2015 request, the Human and Ecological Risk Office (HERO) reviewed the September 18, 2015 Soil Management Plan (SMP) prepared by AMEC Foster Wheeler in Irvine, CA. HERO recommends the following revisions to the SMP.

Comment 1 - Impacted Soil: Section 3.0, page 3, Section 5.0, page 4, Section 5.3, page 7 and Section 5.5, page 6

HERO recommends revising the SMP to define impacted soil based on both observational (visual staining, odors or other observations) and as soil that may be disturbed from areas delineated in Figure 7, Areas of Residual Soil Impacts.

Response – Text has been revised to include this information in the section noted.

Comment 2 - Section 5.2, Monitoring Requirements, page 5: In the first sentence of this section, HERO recommends revision to include monitoring requirements not only based on visible staining, but also areas identified on Figure [7], Areas of Residual Soil Impacts.

Response – Text has been revised to include this information.

Comment 3 - Figure 7, Areas of Residual Soil Impacts: The Phase II Removal Action Completion Report (RACR) is not yet final, therefore HERO recommends ensuring that Figure 7 is updated, if needed, to identify all areas in Phase II with remaining residual soil impacts above remedial goals identified in the Final Phase II RACR approved by DTSC.

Response – Areas with PCBs left in place in the Phase II Area above the remediation goal of 23 mg/kg are covered with an underground warning barrier (UWB). The locations of the UWBs are noted on Figures 4 and 7. Figure 4 has been updated to include the highest total PCB concentration detected in soil, concrete and/or fill material that remains below the UWBs.

EPA Region 9 Comments for Pechiney Cleanup Site (10/6/15) - The following comments pertain to Section 5.1 in the Draft Soil Management Plan.

Comments 1- Paragraph on UWB – This section should include a table with the highest concentration of PCBs left in place for each UWB location in Figure 4.

Response – The highest total PCB concentrations detected in soil, concrete and/or fill material that remains below the UWBs have been added to Figure 4 and a small summary table was added to the text in Section 2.0 after the second to last paragraph of this section.

Comment 2 - Paragraph on alternative to segregation approach – Under the current approval[1], mixing of soils in areas contaminated by PCBs in the 0-5 ft range and 5-15 ft range is prohibited, as there are different cleanup levels in those depth ranges (Section A, Conditions 1c and 1d). Section 5.1 of the draft Soil Management Plan proposes an alternative to the "segregation approach": one in which soils in the 5-15 ft range may be placed in the 0-5 ft range as long as they are covered by a building slab or pavement (i.e., concrete or asphalt).

If Pechiney, AMEC, or a future land owner wishes to pursue this option, the building slab or paved area covering soils from the 5 - 15 ft range would need to meet the requirements for a cap stated in 40 CFR §§ 761.61(a)(7) and (a)(8). For example, in addition to a minimum thickness for the cap, these requirements establish among other things, a time limit for beginning repair activities, responsibility for inspecting and maintaining the cap in perpetuity, and recordkeeping requirements. Please note, however, that a restrictive land use covenant and not a "deed notice" is required under the current EPA Approval that addresses PCBs remaining at the site including any caps and subsurface warning barriers. A specific location beneath the building slab or pavement should be chosen to consolidate the soils and a warning membrane be placed atop the PCB containing soils. As noted in the draft SMP, survey coordinates should be recorded for that location and added to the LUC.

[1] "*USEPA Conditional Approval under 40 CFR 761.61(c) at the Former Pechiney Cast Plate Inc. Facility in Vernon, CA.*" July 1, 2011.

AMEC also proposes[2] characterizing the soil under the cap in-situ after placement. However, this data, if used for disposal, would constitute dilution of the PCBs in the contaminated soils. Instead, EPA prefers that Pechiney, AMEC, and/or any future property owner designate the soils (from the 5-15 ft depth range to be placed under a cap) as containing 23 mg/kg of total PCBs, which is the cleanup level for that depth range.

Any further disturbance of the soil for construction activities (such as installation of utility lines) should trigger extra sampling in the area to be disturbed as a further precaution to verify that those soils do not contain greater than 23 mg/kg total PCBs.

Furthermore, the property owner must ensure that any cuts in soil to be consolidated under a cap does not exceed 15 ft below native surface grade. Uncertainties remain concerning the presence of PCB in soils beyond 15 ft, so those materials should be assumed to contain greater than 50 mg/kg.

Response – Section 5.1 has been revised to address the above comments.

As further clarified by EPA via email on 10/9/15, a restrictive land use covenant recording for the cap and underlying soil shall comply with 40 CFR 761.61(a)8, and will not require a low occupancy area designation noted in 40 CFR 761.61(a)(8)(i)(A)(1) or certification noted in 40 CFR 761.61(a)(8)(i)(B). This information has been added to Section 5.1

[2] *"Pechiney – Revised SMP Text Modification"* email sent September 29, 2015